

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Patricio Flores and Jose Encalada,
as Co-Trustees and Personal Representatives
for the next-of-kin of Maria Iñamagua
Merchan,

Plaintiffs,

v.

Case Type: Civil Rights/
Wrongful Death/Medical
Malpractice

Court File No. 09-cv-838
JMR/SRN

The United States of America; The U.S.
Department of Homeland Security,
Immigrations and Customs Enforcement
("ICE"); Scott Banieceke, individually and in
his official capacity as Field Officer, ICE; an
Unknown Number of Unnamed and
Unknown Agents of ICE; The County of
Ramsey, Minnesota;
Robert Fletcher, individually and in his
official capacity as Sheriff of Ramsey
County; Ramsey County Adult Detention
Center; Ramsey County Sheriff's
Department; Robert Fletcher-Ramsey County
Sheriff; Ramsey County Department of
Health; Robert W. Fulton-Director of
Ramsey County Department of Health;
"XYZ" Family Practice Clinic; Ramsey
County Adult Detention "Family Practice
Clinic" and Unidentified Medical Clinics I-
V; Drs. John Doe or Jane Does I-V-
Unidentified Jailor Contract Medical
Doctors; Robert Moxley-Goldsmith,
individually and in his capacity as Head
Nurse; Erika Thompson, R.N., individually
and in her capacity as Jail Nurse;
Chris Strand, individually and in her capacity
as Jail Nurse; Kelli LNU, -- Unidentified Jail
Nurse; John Roe or Jane Roes-Unidentified

**AFFIDAVIT OF
MELISSA DOSICK RIETHOF**

(identified in caption as Drs. John
Doe or Jane Does I-V-Unidentified
jailor Contract Medical Doctors
and "XYZ" Family Practice Clinic;
Ramsey County Adult Detention
"Family Practice Clinic" and
Unidentified Medical Clinics I-V)

Jail Nurses I-V; Mary Roby, individually and in her capacity as Ramsey County Housing Sergeant; Jill Jones, individually and in her capacity as Ramsey County Corrections Officer; T. Bennet, individually and in his capacity as Ramsey County Corrections Officer;

Cheryl Caumiant, individually and in her capacity as Ramsey County Corrections Officer; John Poe or Jane Poes I-V- Unidentified Ramsey County Sheriffs, Deputies, Correctional Officers and Guards,

Defendants.

STATE OF MINNESOTA)
) ss:
COUNTY OF HENNEPIN)

Melissa Dosick Riethof, being first duly sworn on oath, deposes and states as follows:

1. I am one of the attorneys representing Defendants Gregory Salmi, M.D. and Advance Practice Solutions, P.A. in the above-entitled action.
2. Attached hereto as Exhibit A is a true and correct copy of the Employment Agreement dated January 1, 2005.
3. Attached hereto as Exhibit B is a true and correct copy of the Agreement Between Ramsey County and Advanced Practice Solutions, P.A. dated January 14, 2009.
4. Attached hereto as Exhibit C is a true and correct copy of *Thomas W. Wales v. Dr. Tran, et al.*, No. 08-39, 2008 WL 4867699 (D. Minn. Nov. 4, 2008).

5. Attached hereto as Exhibit D is a true and correct copy of *Henry L. Jackson v. The Federal Bureau of Prisons, et al.*, No. 06-1347, 2007 WL 843839 (D. Minn. Mar. 16, 2007).

6. Attached hereto as Exhibit E is a true and correct copy of *George R. Studnicka v. A. Daniel Pinheiro, et al.*, No. 05-723, 2006 WL 1579876 (D. Minn. June 2, 2006).

7. Attached hereto as Exhibit F is a true and correct copy of *Romero Silvian-Medrano v. Federal Bureau of Prisons, et al.*, No. CV 309-012, 2010 WL 768181 (S.D. Ga. Mar. 4, 2010).

8. Attached hereto as Exhibit G is a true and correct copy of *Timothy Wayne Eddington, etc. v. Eldon Wyatt, et al.*, No. 8:09-cv-02669, 2010 WL 146297 (D.S.C. Jan. 11, 2010).

9. Attached hereto as Exhibit H is a true and correct copy of *Justin Longmire v. Dr. Michael Carroll, et al.*, No. 3-06-CV-1503-P, 2006 WL 3542707 (N.D. Tex. Dec. 8, 2006).

10. Attached hereto as Exhibit I is a true and correct copy of *Vernon Bonner v. Federal Bureau of Prisons, et al.*, No. 05-2892, 196 Fed. Appx. 447, 2006 WL 2404489 (C.A.8 (Minn. Aug. 22, 2006)).

This concludes my affidavit.

s/Melissa Dosick Riethof

Melissa Dosick Riethof

Subscribed and sworn to before me
this 29th day of June, 2010.

s/Robyn E. Setzer

Robyn E. Setzer

Notary Public - Minnesota

My Commission Expires Jan. 31, 2015

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